

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HANS RUIGROK,

Plaintiff,

V.

SCANDENT GROUP, INC.,

Defendant.

CIVIL ACTION NO. 04-11887-MLW

JOINT STATEMENT FOR SCHEDULING CONFERENCE

Pursuant to Fed. R. Civ. P. 16(b), Local Rule 16.1 and this Court's Notice of Scheduling Conference, dated November 5, 2004, the parties submit this Joint Statement setting forth their proposed discovery plans and motion schedules. The parties will file separately their respective certifications.

A. Proposed Discovery Plan

The parties the following discovery schedule:

1. Initial Disclosures completed on or before December 31, 2004.
2. Close of discovery on July 31, 2005.
3. Plaintiff shall disclose its expert witness(es) on or before August 31, 2005.
4. Defendants shall disclose their expert witness(es) on or before September

30, 2005

B. Proposed Motion Schedule

The parties propose that all motions pursuant to Rule 56 be filed on or before thirty (30) days after the last expert disclosure. Oppositions to such motions shall be due within thirty (30)

days of service. Reply Memorandum may be filed no later than ten (10) days after service of any opposition.

C. Matters To Be Discussed At Scheduling Conference

None.

D. Trial By Magistrate Judge

Neither party consents to trial by magistrate judge in this matter.

Respectfully submitted,

<p>HANS RUIGROK</p> <p>By his attorneys,</p> <p><u>/s/ G. Rubenstein</u></p> <p>Gregg A. Rubenstein (BBO #639680) NIXON PEABODY LLP 100 Summer Street Boston, Massachusetts 02110 (617) 345-1000</p>	<p>SCANDENT GROUP, INC.</p> <p>By its attorneys,</p> <p><u>/s/ P. Sabalis</u></p> <p>Patricia M. Sabalis (BBO #436730) Downs Rachlin Martin PLLC 199 Main Street Post Office Box 190 Burlington, VT 05402-0190 (802) 863-2375</p>
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